

EH&S Reporting Activities for July 2004

Key Activities

- As of July 31st, there have been <u>47</u> days without a lost-time injury. There were no recordable injuries in July. JLab has had 13 recordable injuries so far in FY 2004. By comparison in FY 2003, there had been only eight recordable injuries.
- JLab had a July 28th unannounced Virginia Department of Environmental Quality (DEQ) inspection of the Lab's cooling tower discharge permit. The DEQ inspection did not note any violations and no recommendations resulted. The Office of Assessment received excellent support from Facilities Management Systems Operations staff (Dave Kausch and Bill Rust) during the course of the inspection.
- EH&S performance measures for the DOE/SURA contract were significantly revised in July. The revised draft FY 2005 EH&S performance measures have been distributed for DOE and SURA management review. The proposed revisions include inclusion of nuclear physics user occupational injuries. This addition would make JLab consistent with the Fermilab and Stanford Linear Accelerator Center injury recording practices.

Other Activities

Occurrence Reporting

- EH&S Reporting prepared an executive summary of the changes for the revised EH&S Manual Chapter 5300, Occurrence Reporting, and associated appendices, for the Director's Council. The new DOE occurrence reporting order (ORPS) was implemented by JLab effective December 1, 2003.
- EH&S Reporting prepared a draft response to an Office of Science request for JLab specific information on the new ORPS order's requirement for quarterly performance analysis of facility events. Following management review, this information was forwarded to the DOE Site Office.
- Two recent JLab events were screened by EH&S Reporting for possible categorization as ORPS-reportable. The first event involved the use of a motorized manlift for CHL building maintenance and the resulting

deformation of a floor grating. This event was screened for ORPS reporting in the "near miss" category.

The second event was a Test Lab crane problem when the crane hook pulled a power cord from a fan filter unit. This event was screened for ORPS reporting in the "near miss" and safety/health categories.

Both events were determined to be not ORPS reportable. Both events were investigated using the JLab Notable Event Report format. Appropriate causal analysis and corrective actions have been completed for both events.

Price-Anderson

- EH&S Reporting discussed the open JLab Price-Anderson event report (the May 2004 Vertical Test Area, VTA, unauthorized inter lock modification discovery) with DOE Office of Enforcement (OE) staff on July 16th. Descriptive information on VTA equipment and processes was provided at OE request. There is one corrective action (eight actions have been completed) still open for this Price-Anderson reportable event. This open action involves improving the configuration and type of shield interlock switches. The open corrective action completion date is October 31, 2004, and the action has been assigned to the Accelerator Division Safety Systems Group.
- Carter Ficklen attended the 49th annual Health Physics Society in Washington, DC. The Accelerator Section held morning and afternoon sessions on July 13th. Initial planning is being conducted by the Accelerator Section on organizing a 2008 radiation generating machine (RGM) midyear symposium in the San Francisco area. The last (1997) RGM symposium had roughly 80% of the papers on accelerator radiation protection and safety systems. The Accelerator Section Board appointed Carter Ficklen as the RGM Midyear Committee Chair.
- EH&S Reporting assisted JLab Security with updating unusual event telephone call lists for EH&S, radiation control, and emergency management staff.

Work Smart Standards (WSS) Set

- EH&S Reporting continued working with the Policy and Manuals staff to incorporate a review of WSS Set items along with EH&S Manual updates. This may be accomplished through an on-line system that is currently under development.
- Proposed changes to EH&S Manual Chapter 2420 are being processed.
- A new ANSI standard related to Lock, Tag & Try is being considered for addition to the Set.

National Environmental Policy Act (NEPA)

- The start of preparation of the CEBAF and FEL Upgrade Environmental Assessment (EA) is awaiting notice from DOE.
- EH&S Reporting is working with other Lab staff to address other NEPA items, including actions related to the new retention pond planned to be constructed later this year.

Storm Water Permit Items

- Construction Activity under Permit VAR 103277
 - The new permit to cover the Phase 1 CEBAF Center Addition and new retention pond became effective on July13.
 - The Permit and Working Draft of the Storm Water Pollution Prevention Plan (SWP3) are accessible on the **jlab.org/ehs** web page.
- Best Management Practices under Permit VAR 040079
 - EH&S Manual Chapter 6733 is being revised to document a site Storm Water Management Program, which will address permit and regulatory requirements.
 - The Year 1 progress report identified changes to the Best Management Practices and measurable goals that need to be incorporated into the site program in 2004.

Environmental Management System (EMS)

- The EMS Implementation Team and backups focused on completing the review of all Lab processes.
- The Team began entering information into the new EMS tracking system (Credits for the database to Accelerator Division EH&S Dept. staff, S. Prior and W. Ishom).

EH&S Policies & Manual Group Highlights July 2004

➤ Policies & Manual Group Initiatives

- Work on the PMG module resumed. Wesley is making changes to the design based upon the feedback from Christina and me. We are also working on a color scheme for the Level 1-4 reviews that will coincide with the color-coded table. Wesley is investigating a download feature from the PMG module to Excel in the color-coded table format. This would be a tremendous help and time saver as it takes a lot of time updating this table. Wesley also developed a function to automatically change the chapter review level upon entry of a completion date for the previous level review. Auto features recommended should help expedite the data entry associated with revisions tracking.
- ✓ Physics Division requested an additional controlled paper copy of the EH&S Manual to be located at the Counting House. The request is in response to an independent assessment recommendation. There are several administrative questions raised in association with this request that once resolved may result in a change to Reference Appendix 1200-R1. I added the issue to the August 2004 JEHSC agenda for discussion.

> EH&S Manual Updates

- ✓ Chapter 2410 *Applicable Regulations and Contractual Commitments* the Level 2 review is complete, no comments received.
- ✓ Chapter 3310, Standard Operating Procedures and Operational Safety Procedures Level 3 review document provided to author for review and approval to distribute. Main change to the chapter was to establish a required time limit for periodic review of SOPs/OSPs at every 3 years. This number was chosen to simulate the review frequency for EH&S Manual chapters/appendices, which is triennial.
- ✓ Chapter 5200, *Incident Investigation* Preparation of Level 4 copy for Director's Council (DC) review was delayed until August 2004.
- ✓ Chapter 5300, *Occurrence Reporting*, is ready for Level 4 DC review. Chapter 5300 will be sent to Director's Council in August 2004.
- ✓ Chapter 6140, *Cranes & Hoists*, Chapter went out for level 2 review. Comments requested back by July 26th have been received and are being compiled.
- ✓ Technical Appendix 6210-T2, *Extension Cord Safety* Sent word version of appendix to author on 7/12/04. Author will add additional changes received from ESS members prior to submitting Appendix to Director's Council for approval. See PMG-2004-56-01.
- ✓ Chapter 6220, AC Electrical Power Distribution Safety, completed Level 3 review. Comments were forwarded to author on 7/7/04. Comments were received from the outgoing EES Chair along with level 3 changes on 7/20/04.

EH&S Policies & Manual Group Highlights July 2004

- ✓ Chapter 6240, *Electrical Equipment Construction* No change in status from June 2004 highlights. See PMG-2004-07-01.
- ✓ Chapter 6420, *RF and Microwave Radiation*, completed level 3C review. Comments were compiled and forwarded to author. This chapter was among those in the backlog.
- ✓ Chapter 6732, *Oil Spill Prevention Control and Countermeasures* Chapter, EP Supplement content, and appendices have been sent out for level 2 review. Comments are requested back by August 10th. This chapter was among those in the backlog.
- ✓ Chapter 6630, *Respiratory Protection* Forwarded comments from level 2 review to author on 7/16/04. Only received comments from one reviewer. Awaiting author's feedback before initiating Level 3 review.
- ✓ Chapters 6810, 6820, and 6830 are under review by Medical Services authors, Dr. Chandler & Heather Singleton.
- ✓ The RadCon Manual Supplement completed Level 3 review. Awaiting comments and editorial suggestions from L. Even who plans to provide input on or before Friday July 30. Refer to PMG-2004-55-01.

> EH&S Manual Revision Status – Color Coded Table

✓ The color coded table of EH&S Manual chapters and appendices (dated July 8, 2004) can be viewed at: http://docushare.jlab.org/Get/File-8112/Color_coded_table-4-29-04.xls.

➤ Issues/Concerns

- ✓ Facilities Management Director submitted a concern about Chapter 3330 regarding cross-divisional stop work situations. I am still awaiting some suggested language changes to Chapter 3330 from Rusty.
- ✓ PMG activities backlog continued to be a problem during July in part due to competing EH&S Department commitments for the revamped EH&S inspection process and EMS team activities.